

ORIGINAL

1401 H Street, N.W.
Suite 1020
Washington, D.C. 20005
Office 202/326-3815

EX PARTE OR LATE FILED



James K. Smith
Director
Federal Relations

August 12, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RECEIVED

AUG 12 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: **Ex Parte Statement**
CC Docket 96-98
UNE Remand Proceeding

Dear Ms. Salas:

On August 11, 1999, John Lenahan, Gary Phillips, Christopher Heimann, and I met with Jake Jennings and Christopher Libertelli of the Policy and Planning Division, Common Carrier Bureau. The purpose of the meeting was to provide data showing collocated competitors with switches on a wire center basis. In response to staff request, data was aggregated on a Metropolitan Statistical Area (MSA) basis. Ameritech indicated that use of MSAs could provide greater certainty and that the top 100 MSAs would be a reasonable geographic basis for determining where unbundled local switching (ULS) would not be required as a UNE, assuming that any such determination applied to all wire centers within those MSAs. Ameritech stated that the Commission would also have to consider the presence of competitive alternatives in individual wire centers located outside the top 100 MSAs.

Sincerely,

A handwritten signature in cursive script, likely belonging to James K. Smith.

Attachment

cc: J. Jennings
C. Libertelli

No. of Copies rec'd 015
List ABCDE



Collocated Competitors with Switches by Wire Center

Number of Competitors per AIT Wire Center	Ameritech Wire Centers		Lines Served		Cumulative % Lines Served		
	Cumulative Count	Cumulative Percentage	Cumulative Total	Cumulative Percentage	Largest Bus. Percentage	Other Bus. Percentage	Residential Percentage
7	2	0.2%	215,882	1.0%	3.4%	1.6%	0.1%
6 or more	7	0.6%	721,642	3.5%	7.3%	4.3%	1.9%
5 or more	15	1.3%	1,212,359	5.9%	11.4%	7.4%	3.5%
4 or more	34	3.0%	2,513,009	12.2%	20.2%	14.5%	8.7%
3 or more	57	5.0%	3,746,671	18.2%	26.5%	21.0%	14.5%
2 or more	119	10.5%	6,803,467	33.1%	45.6%	36.1%	27.7%
1 or more	256	22.7%	11,569,706	56.2%	68.2%	58.2%	51.2%
0 or more	1130	100.0%	20,583,377	100.0%	100.0%	100.0%	100.0%

Note: For the purposes of this analysis, AT&T, MCI WorldCom and McLeod's acquisitions were treated as one competitor under the parent company's name even though the respective companies have yet to consolidate all of their collocation and interconnection agreements. Therefore, AT&T and TCG were treated as one competitor; MCI metro, WorldCom, Brooks Fiber, and MFS were considered one competitor; and McLeod, Ovation, Phone Michigan, Dakota Services and QST were considered one competitor.

Collocated Competitors with Switches by Wire Center: Top 100 MSAs

Number of Competitors per AIT Wire Center	Ameritech Wire Centers		Lines Served		Cumulative % Lines Served		
	Cumulative Count	Cumulative Percentage	Cumulative Total	Cumulative Percentage	Largest Bus. Percentage	Other Bus. Percentage	Residential Percentage
7	2	0.4%	215,882	1.5%	4.7%	2.1%	0.1%
6 or more	7	1.3%	721,642	4.9%	10.3%	5.8%	2.6%
5 or more	15	2.7%	1,212,359	8.2%	16.0%	9.9%	4.9%
4 or more	33	6.0%	2,429,427	16.4%	27.7%	18.6%	11.7%
3 or more	53	9.7%	3,545,395	23.9%	35.7%	26.7%	18.9%
2 or more	103	18.9%	6,141,512	41.5%	56.9%	44.9%	34.9%
1 or more	186	34.1%	9,066,345	61.2%	73.2%	63.7%	56.2%
0 or more	546	100.0%	14,806,867	100.0%	100.0%	100.0%	100.0%

Note: For the purposes of this analysis, AT&T, MCI WorldCom and McLeod's acquisitions were treated as one competitor under the parent company's name even though the respective companies have yet to consolidate all of their collocation and interconnection agreements. Therefore, AT&T and TCG were treated as one competitor; MCI metro, WorldCom, Brooks Fiber, and MFS were considered one competitor; and McLeod, Ovation, Phone Michigan, Dakota Services and QST were considered one competitor. This analysis encompasses Ameritech cities in the Top 100 MSAs. These cities are Chicago, Detroit, Cleveland, Indianapolis, Milwaukee, Columbus, Grand Rapids, Dayton-Springfield, Akron, Gary, Toledo, Youngstown, and Ann Arbor.

Collocated Competitors with Switches by Wire Center: Top 50 MSAs

Number of Competitors per AIT Wire Center	Ameritech Wire Centers		Lines Served		Cumulative % Lines Served		
	Cumulative Count	Cumulative Percentage	Cumulative Total	Cumulative Percentage	Largest Bus. Percentage	Other Bus. Percentage	Residential Percentage
7	2	0.5%	215,882	1.8%	5.4%	2.5%	0.1%
6 or more	7	1.8%	721,642	5.9%	11.8%	6.9%	3.2%
5 or more	15	3.9%	1,212,359	9.8%	18.3%	11.8%	6.0%
4 or more	33	8.7%	2,429,427	19.7%	31.7%	22.2%	14.3%
3 or more	53	13.9%	3,545,395	28.8%	40.9%	31.9%	23.2%
2 or more	99	26.1%	5,984,966	48.6%	63.6%	52.4%	41.7%
1 or more	154	40.5%	8,072,327	65.5%	76.7%	67.7%	60.5%
0 or more	380	100.0%	12,321,837	100.0%	100.0%	100.0%	100.0%

Note: For the purposes of this analysis, AT&T, MCI WorldCom and McLeod's acquisitions were treated as one competitor under the parent company's name even though the respective companies have yet to consolidate all of their collocation and interconnection agreements. Therefore, AT&T and TCG were treated as one competitor; MCI metro, WorldCom, Brooks Fiber, and MFS were considered one competitor; and McLeod, Ovation, Phone Michigan, Dakota Services and QST were considered one competitor. This analysis encompasses Ameritech cities in the Top 50 MSAs. These cities are Chicago, Detroit, Cleveland, Indianapolis, Milwaukee, and Columbus.

Ameritech Business Customer Base by Linesize

Customers are Defined at Location Level

<u>Linesize</u>	<u># of Customers</u>	<u>% of Base</u>
1	557,298	42.2%
2	245,114	18.5%
3	159,433	12.1%
4	88,728	6.7%
5	54,993	4.2%
6-10	114,180	8.6%
11-15	40,713	3.1%
16-20	18,607	1.4%
21+	43,005	3.3%
Total	1,322,071	100%